

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:

Stream TV Networks, Inc.,<sup>1</sup>

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

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In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

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STREAM TV NETWORKS, INC. and  
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. No. 23-00057

SHADRON L. STASTNEY, SLS HOLDINGS  
VI, LLC, HAWK INVESTMENT HOLDINGS  
LIMITED, ARTHUR LEONARD ROBERT  
"BOB" MORTON, SEECUBIC, INC.,  
ALASTAIR CRAWFORD, KRZYSZTOF  
KABACINSKI, KEVIN GOLLOP, ASAF  
GOLA, JOHN DOE(S), JANE DOE(S),  
DELAWARE and OTHER LAW FIRMS  
representing and acting in concert with John  
Doe(s) and/or Jane Doe(s), INVESTMENT  
BANKS employed by John Doe(s) and/or Jane  
Doe(s), PATRIC THEUNE, and SEECUBIC  
B.V.,

Defendants.

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<sup>1</sup> The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

**WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS' MOTION FOR A  
TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION, AND  
PERMANENT INJUNCTION**

The above captioned Debtors, Debtors in Possession, and Plaintiffs, (“Debtors”) submit this witness and exhibit list for the hearing scheduled for **October 6, 2023, at 10:30am (ET)** (“Hearing”) before the Honorable Magdeline D. Coleman, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, located at 900 Market Street, Suite 203, Philadelphia, Pennsylvania, 19807.

**WITNESSES**

The Debtors designate the following persons as witnesses who may be called at the Hearing:

1. Mathu Rajan, Founder and CEO of StreamTv
2. Shadron Stastney, Executive Chairman of SeeCubic, Inc.
3. Charles Robertson, former officer of StreamTv
4. Chris Michaels, President and CEO of Brown & Michaels, PC

The Debtors also cross-designate all witnesses designated by any other party in connection with the Hearing, and reserve the right to call any necessary rebuttal or impeachment witnesses.

**EXHIBITS**

The Debtors designate the following exhibits that may be used at the Hearing:

<b>Exhibit No.</b>	<b>Description</b>
1	Philips License
2	Rembrandt License
3	License Covenant
4	SeeCubic Subscription Agreement

5	SeeCubic 2022 Private Placement Memorandum
6	SeeCubic 2020 Private Placement Memorandum
7	Stastney Deposition Transcript
8	Declaration of Mathu Rajan
9	Declaration of Charles Robertson
10	<i>SI Handling Sys. v. Heisley</i> , 753 F.2d 1244, 1264 (3d Cir. 1985)
11	<i>Par Pharm., Inc. v. Quva Pharma, Inc.</i> , 764 F. App'x 273, 279-80 (3d Cir. 2019)
12	<i>BP Chems. Ltd. v. Formosa Chem. &amp; Fibre Corp.</i> , 229 F.3d 254, 263 (3d Cir. 2000)
13	<i>Ilapak, Inc. v. Young</i> , 2020 U.S. Dist. LEXIS 94550, at *15-17 (E.D. Pa. May 29, 2020)
14	<i>Middle E. Forum v. Reynolds-Barbounis</i> , 2021 U.S. Dist. LEXIS 4350, at *17 (E.D. Pa. Jan. 8, 2021)
15	<i>Razor Tech., LLC v. Hendrickson</i> , 2018 U.S. Dist. LEXIS 74918, at *29 (E.D. Pa. May 3, 2018)
16	<i>N. Am. Dental Mgmt., LLC v. Phillips</i> , 2023 U.S. Dist. LEXIS 122070 (W.D. Pa. July 14, 2023)
17	<i>Cont'l Grp., Inc. v. Amoco Chems. Corp.</i> , 614 F.2d 351 (3d Cir. 1980)
18	<i>Ritescreen Co., LLC v. White</i> , 2023 U.S. Dist. LEXIS 140983 (M.D. Pa. Aug. 11, 2023)
19	<i>Advanced Fluid Sys. v. Huber</i> , 958 F.3d 168 (3d Cir. 2020)
20	<i>In re StreamTv</i> June 27, 2023 Hearing Transcript
21	StreamTv TRO Power Point
22	<i>In re StreamTv</i> April 14, 2023 Hearing Transcript
23	<i>In re StreamTv</i> June 29, 2023 Hearing Transcript
24	SeeCubic et al September 12, 2023 Dutch Claim Amendment

The Debtors also cross designate all exhibits designated by any other party in connection with the Hearing and reserve the right to use additional exhibits for rebuttal or impeachment purposes.

The Debtors reserve the right to amend or supplement this witness and exhibit list prior to the Hearing.

Dated: October 6, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena  
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*(pro hac to be filed)*

*Counsel to the Debtors*